

1 LYSSA S. ANDERSON
 2 Nevada Bar No. 5781
 3 TRAVIS STUDDARD
 4 Nevada Bar No. 16454
 5 KAEMPFER CROWELL
 6 1980 Festival Plaza Drive, Suite 650
 7 Las Vegas, Nevada 89135
 8 Telephone: (702) 792-7000
 9 Fax: (702) 796-7181
landerson@kcnvlaw.com
tstuddard@kcnvlaw.com

10 *Atorneys for Defendants*
 11 *Richard Newman, Angela Patton,*
James Portello, Cesar Esparza,
Kenneth Kelsey, Rogelio Mariscal,
Tutulupeatau Mataele, Raymond Bunch,
Kimberly Shrewsberry, Cheryl Whetsel,
Gerald Razo, Jesse Reynolds,
Bryce Walford, Tanya Vai, Kyle Banagan,
Ty-Yiviri Glover, Stephen White, Christopher Hunter,
Douglas Taylor, Michael Chambers, and Mitchell Green

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 RAMON MURIC-DORADO,

15 CASE NO.: 2:18-cv-01184-JCM-EJY

16 Plaintiff,

17 vs.

18 LAS VEGAS METROPOLITAN POLICE
 19 DEPARTMENT, et al.

20 **STIPULATION TO EXTEND
 21 DISPOSITIVE MOTION DEADLINE
 22 (Second Request)
 23 [ECF No. 251]**

24 Defendants.

25 The parties by and through their respective counsel, hereby stipulate, agree, and request
 26 that this Court extend the dispositive motion deadline from the current date of June 16, 2025, for
 27 thirty (30) days, until **July 16, 2025** as Defendants' Counsel will require additional time to prepare
 28 the dispositive motions due to the number of Defendants.

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I. DISCOVERY COMPLETED TO DATE

2 Ramon Muric-Dorado (“Plaintiff”) and Defendants Richard Newman, Angela Patton,
3 James Portello, Cesar Esparza, Kenneth Kelsey, Rogelio Mariscal, Tutulupeatau Mataele,
4 Raymond Bunch, Kimberly Shrewsberry, Cheryl Whetsel, Gerald Razo, Jesse Reynolds, Bryce
5 Walford, Tanya Vai, Kyle Banagan, Ty-Yiviri Glover, Stephen White, Christopher Hunter,
6 Douglas Taylor, Michael Chambers, and Mitchell Green (“LVMPD Defendants”), have
7 exchanged their initial Rule 26 Disclosures. The LVMPD Defendants provided nine (9)
8 supplements to their Rule 26 Disclosures during discovery. Plaintiff served interrogatories on June
9 15, 2020 on the individual LVMPD Defendants (Richard Newman, Angela Patton, James Portello,
10 Cesar Esparza, Kenneth Kelsey, Rogelio Mariscal, Tutulupeatau Mataele, and Raymond Bunch),
11 and two requests for production of documents. The LVMPD Defendants responded to the
12 interrogatories and requests for production of documents. The LVMPD Defendants served
13 Requests for Admissions on Plaintiff on September 15, 2022, and Plaintiff provided responses on
14 October 21, 2022 to the first forty Requests for Admissions and both objected to and denied all
15 subsequent Requests for Admissions. The LVMPD Defendants served Requests for Production
16 of Documents on Plaintiff on September 15, 2022.

17 The LVMPD Defendants took the deposition of Plaintiff on March 29, 2024 and May 17,
18 2024.

Throughout October 2024, each individual LVMPD Defendant served requests for admissions and interrogatories on Plaintiff, which were specific to the remaining claims in this matter. Following a hearing on the LVMPD Defendants' Motion to Compel, Plaintiff provided responses. On January 15, 2025, Plaintiff served interrogatories on eleven (11) individual LVMPD Defendants and a request for production of documents. The LVMPD Defendants provided their responses to all interrogatories and the requests for production of documents on February 13, 2025.

1 **II. DISCOVERY YET TO BE COMPLETED**

2 Discovery is completed. The parties are requesting an extension of the current dispositive
 3 motion deadline only.

4 **III. REASONS WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

5 The parties are requesting a thirty (30) day extension of the current dispositive motion
 6 deadline. There are twenty-one (21) Defendants in this matter. Counsel will be filing dispositive
 7 motions related to the claims against each Defendant. As such, Counsel will need additional time
 8 due to the number of Defendants and Motion that they anticipate filing.

9 **IV. PROPOSED EXTENDED DEADLINES**

10 The Parties respectfully request this Court enter an order as follows:

Deadline	Current Date	Proposed New Date
Dispositive Motion Deadline	June 16, 2025	July 16, 2025
Pre-Trial Order Deadline	July 16, 2025	August 15, 2025

15 **A. Motions in Limine/*Daubert* Motions.**

16 Under LR 16-3(b), any motions in limine, including *Daubert* motions, shall be filed and
 17 served 30 days prior to the commencement of Trial. Oppositions shall be filed and served and the
 18 motion submitted for decision 14 days thereafter. Reply briefs will be allowed only with leave of
 19 the Court.

20 **B. Extensions or Modification of the Discovery Plan and Scheduling Order.**

21 In accordance with LR 26-3, applications to extend any date set by the discovery plan,
 22 scheduling order, or other order must, in addition to satisfying the requirements of LR 6-1, be
 23 supported by a showing of good cause for the extension. All motions or stipulations to extend a
 24 deadline set forth in a discovery plan shall be received by the Court not later than 21 days before

1 the expiration of the subject deadline. A request made after the expiration of the subject deadline
2 shall not be granted unless the movant demonstrates that the failure to set was the result of
3 excusable neglect. Any motion or stipulation to extend a deadline or to reopen discovery shall
4 include:

5 (a) A statement specifying the discovery completed;
6 (b) A specific description of the discovery that remains to be completed;
7 (c) The reasons why the deadline was not satisfied or the remaining discovery was not
8 completed within the time limits set by the discovery plan; and
9 (d) A proposed schedule for completing all discovery.

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1 This request for an extension is made in good faith and joined by all the parties in this case.
2 The Request is timely. Trial is not yet set in this matter and dispositive motions have not yet been
3 filed. Accordingly, this extension will not delay this case. Moreover, since this request is a joint
4 request, neither party will be prejudiced. The extension will allow Counsel time to prepare the
5 necessary dispositive motions for all the Defendants.

6 DATED this 13th day of May, 2025.

7 GOODWIN LAW GROUP

8 /s/ *Charles R. Goodwin*

9 CHARLES GOODWIN
10 Nevada Bar No. 14879
11 3100 W Charleston Blvd
12 Las Vegas, NV 89102

13 *Attorneys for Plaintiff*
14 *Ramon Muric-Dorado*

5 DATED this 14th day of May, 2025.

6 KAEMPFER CROWELL

7 /s/ *Lyssa S. Anderson*

8 LYSSA S. ANDERSON
9 Nevada Bar No. 5781
10 TRAVIS STUDDARD
11 Nevada Bar No. 16454
12 1980 Festival Plaza Drive, Suite 650
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17 *Rogelio Mariscal, Tutulupeatau Mataele,*
18 *Raymond Bunch, Kimberly Shrewsberry,*
19 *Cheryl Whetsel, Gerald Razo, Jesse*
20 *Reynolds, Bryce Walford, Tanya Vai, Kyle*
21 *Banagan, Ty-Yiviri Glover, Stephen White,*
22 *Christopher Hunter, Douglas Taylor,*
23 *Michael Chambers, and Mitchell Green*

18 **IT IS SO ORDERED.**

19 Dated this 15th day of May, 2025.

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22 **UNITED STATES MAGISTRATE JUDGE**